

The Law Office of Ryan Lozar, P.C.
305 Broadway, 14th Floor; New York, NY 10007
Tel: 1-310-867-1562; Fax 1-877-666-4456
ryanlozar@gmail.com



January 6, 2019

Re: McKenzie v. City of NY, et al., No. 17 Civ. 4899 (PAE) (BCM)

Dear Judge Engelmayer:

I represent Plaintiff in the above-captioned Section 1983 action alleging police misconduct. Defendants have moved for partial summary judgment, Docket Nos. 64-67, and Plaintiff has responded in opposition, Docket Nos. 69-71.

I write to request the Court's leave to file enclosed Exhs. 16-18 under seal in connection with Plaintiff's opposition papers (they are referenced therein). As Defendants have requested that these discovery pages be treated confidentially, Plaintiff makes the instant request and has shared a copy of it with opposing counsel. Plaintiff has also included these three exhibits as part of two hard-copy sets of Plaintiff's motion papers delivered to Defendants which will be part of the motion's bundled delivery to Your Honor's Chambers later this month once briefing is complete.

The enclosed records pertain to a Defendant's allegation of injury during the challenged event. In opening motion papers, this Defendant cited the injury in discussing a contested issue and filed a related exhibit under seal with the Court's leave. In Plaintiff's responsive papers he addressed this same issue as to which enclosed Exhibits 16-18 also relate. Certain Defendant information is redacted where not at issue (home address, phone number).

Respectfully submitted,

A handwritten signature in black ink that reads 'Ryan Lozar'.

Ryan Lozar

Cc: William KeAupuni Akina, Assistant Corporation Counsel (via email and hand delivery)